

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ) 03-MDL-1570 (RCC)  
OF SEPTEMBER 11, 2001 )  
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 )  
 )  
 )  
This Document Relates to: 02-CV-6977 (RCC) )  
 )  
02-CV-1616 (RCC) )  
 )

**NOTICE OF MOTION  
FOR LEAVE TO WITHDRAW AS ATTORNEY OF RECORD**

Pursuant to Local Rule 1.4, undersigned counsel of record for Saudi Binladin Group, Inc. (“SBG”), Bakr Binladin, Omar Binladin, Tariq Binladin, and Khalid Bin Mahfouz hereby move for an Order relieving E. Michael Bradley as an attorney of record. This motion is based upon the attached affidavit of Michael P. Gurdak. In addition, a Proposed Order is also attached hereto.

Dated: January 24, 2005

Respectfully Submitted,



Stephen J. Brogan  
Timothy J. Finn  
Jonathan C. Rose  
James E. Gauch  
Michael P. Gurdak  
JONES DAY  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001  
(202) 879-3939

*Counsel for Defendants SBG,  
Bakr Binladin, Omar Binladin,  
Tariq Binladin, and Khalid Bin Mahfouz*

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**AFFIDAVIT IN SUPPORT OF MOTION  
FOR LEAVE TO WITHDRAW AS ATTORNEY OF RECORD**

Michael P. Gurdak, an attorney at law admitted Pro Hac Vice before the United States District Court for the Southern District of New York, affirms as follows, under the penalties of perjury:

1. I am a partner with Jones Day, counsel of record for Saudi Binladin Group, Inc. (“SBG”), Bakr Binladin, Omar Binladin, Tariq Binladin, and Khalid Bin Mahfouz. My business address is 51 Louisiana Avenue, N.W., Washington, D.C. 20001.
2. I am fully familiar with the facts and circumstances as set forth herein and make this Affidavit in support of Jones Day’s application to relieve E. Michael Bradley as one of the attorneys of record for SBG, Bakr Binladin, Omar Binladin, Tariq Binladin, and Khalid Bin Mahfouz.
3. E. Michael Bradley is no longer affiliated with Jones Day.
4. The withdrawal of E. Michael Bradley will not affect the posture of the case or the calendar of the proceedings in any way.
5. For the foregoing reasons, I respectfully request that this Court grant Jones Day leave to relieve E. Michael Bradley as one of the attorneys of record for SBG, Bakr Binladin,

Omar Binladin, Tariq Binladin, and Khalid Bin Mahfouz in all related consolidated actions. A proposed Order is attached for the Court's convenience.

Dated: January 24, 2005

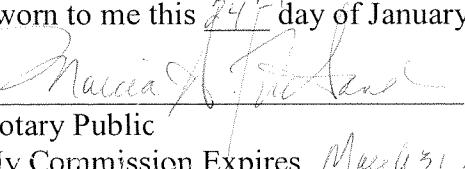
Respectfully Submitted,

  
Michael P. Gurdak

JONES DAY  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001  
(202) 879-3939

*Counsel for Defendants SBG,  
Bakr Binladin, Omar Binladin,  
Tariq Binladin, and Khalid Bin Mahfouz*

Sworn to me this 24<sup>th</sup> day of January, 2005

  
Marcia A. Pihl  
Notary Public

My Commission Expires March 31, 2006

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**ORDER**

This matter came before the Court on motion by Jones Day to remove E. Michael Bradley as one of the attorneys of record for Saudi Binladin Group, Inc. (“SBG”), Bakr Binladin, Omar Binladin, Tariq Binladin, and Khalid Bin Mahfouz in all actions.

Based upon Jones Day’s motion, it is hereby ORDERED that E. Michael Bradley is relieved as one of the attorneys of record for SBG, Bakr Binladin, Omar Binladin, Tariq Binladin, and Khalid Bin Mahfouz in connection with the above entitled consolidated actions.

It is further ORDERED that appearances of Stephen J. Brogan, Geoffrey S. Stewart, Timothy J. Finn, Jonathan C. Rose, James E. Gauch, Michael P. Gurdak, Michael R. Shumaker, Melissa D. Stear, and Jennifer A. Shumaker for SBG, Bakr Binladin, Omar Binladin, Tariq Binladin, and Khalid Bin Mahfouz will remain unchanged.

SO ORDERED:

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Richard Conway Casey  
United States District Judge

Dated: \_\_\_\_\_, 2005